

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

In re: SUBPOENA TO RAPE ABUSE) CIVIL NO.:
AND INCEST NATIONAL NETWORK) 24-0073-ACR
)
PLAINTIFF'S STEERING COMMITTEE,)
)
Petitioner,)
vs.)
)
RAPE ABUSE AND INCEST NATIONAL,)
NETWORK,) August 6, 2024
)
Respondent.) Washington, D.C.
) 2:00 p.m.

Transcript of Motions Hearing
Before the Honorable Ana C. Reyes
United States District Judge

APPEARANCES:

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Proceedings recorded by machine shorthand; transcript produced by computer-aided transcription

1 P R O C E E D I N G S

2 THE CLERK: Case 24-73 Plaintiff's Steering
3 Committee versus Rape and Incest Abuse National Network.4 Counsel, please approach the podium and state your
5 name for the record, starting with plaintiff's counsel.

6 MS. GOLDENBERG: Good afternoon, Your Honor.

7 Marlene Goldenberg on behalf of the Plaintiff's Steering
8 Committee.

9 THE COURT: Good morning -- good afternoon.

10 MS. GOLDENBERG: Whatever it is.

11 MR. SULLIVAN: Good afternoon, Your Honor. My name
12 is John Sullivan, I'm not making an appearance today, but
13 Mr. Adelmann he is a few blocks --

14 THE COURT: Are you an attorney?

15 MR. SULLIVAN: Yes, I am.

16 THE COURT: Are you an attorney for RAINN?

17 MR. SULLIVAN: I'm not making an appearance. I'm
18 here to --19 THE COURT: I'm asking if you're an attorney for
20 RAINN.21 MR. SULLIVAN: I'm not an attorney for RAINN in this
22 court --

23 THE COURT: Why are you here?

24 MR. SULLIVAN: I'm assisting Mr. Adelmann in taking
25 notes just --

1 THE COURT: Are you an attorney?

2 MR. SULLIVAN: Yes.

3 THE COURT: Who is your client?

4 MR. SULLIVAN: It would be RAINN, but I --

5 THE COURT: Okay. Well, then you're up. We start
6 at 2:00 --

7 MR. SULLIVAN: Your Honor --

8 THE COURT: No. We are starting and you're a lawyer
9 and so sit down, we're going.

10 MR. SULLIVAN: Your Honor --

11 THE COURT: Sit down. We're going.

12 Up. First off, in the future, pro hac vice
13 applications are not sort of "do them if you want." All
14 right. Your first filing had a bunch of pro hacs that weren't
15 made. And then my clerk called to find out what was going on.
16 And the answer was, well, this is just like -- we just want
17 you to transfer this, so we're not going to be here long
18 enough for us new pro hacs. In the future do not assume what
19 I'm going to do. And even if you were just going to be here
20 for a minute, if there's a filing, there's a pro hac vice
21 process, we need to follow it, okay?

22 MS. GOLDENBERG: Understood, Your Honor.

23 THE COURT: All right. Secondly, I'm not
24 transferring the case. We're going to this settled today.

25 MS. GOLDENBERG: Okay.

1 THE COURT: Third, I'm not going to argue or hold
2 that they waived their objections because whatever, I'm not
3 going to hold that. You can be seated.

4 You. All right. I am not going to quash the
5 subpoena. And we are going to all figure out what you guys
6 are going to agree to today, because we are not leaving here
7 until you guys produce something, because it is totally
8 inappropriate not to agree to produce any documents.

9 Now, have you two had actual or have you all had
10 actual meet and confers about what documents would get put
11 over?

12 MR. SULLIVAN: I have not personally. Mr. Adelmann
13 has. And he is a few blocks away --

14 THE COURT: I don't care how many blocks away he is.
15 He's not here at 2:00. So do you know what the meet and
16 confers have been?

17 MS. GOLDENBERG: I do, Your Honor.

18 THE COURT: All right. Come on up.

19 MS. GOLDENBERG: The short answer to your question
20 is no, there haven't been substantive meet and confers. RAINN
21 hasn't responded. We did argue some third party subpoena
22 motions out in the MDL. And based on the Court's rulings have
23 narrowed our subpoena, sent narrower requests to RAINN last
24 week, and have not heard back.

25 THE COURT: Okay. Why haven't they heard back?

1 Come on up. Why haven't they heard back in a week?
2 Especially, since we were doing this before a conference that
3 I had to get ready for.

4 MR. SULLIVAN: Your Honor, we have been speaking, we
5 have been --

6 THE COURT: Well, she just told me you haven't
7 been.

8 MR. SULLIVAN: And if I may, I am not an attorney
9 who is admitted in the District of Columbia.

10 THE COURT: I don't care. I'm letting you -- you're
11 in the well of my courtroom and I'm letting you speak.

12 MR. SULLIVAN: Understood. We have been going back
13 and forth. And I understand that --

14 THE COURT: Well, why is she telling me that they
15 haven't heard from you in a week?

16 MR. SULLIVAN: We have -- we did receive some
17 proposed changes to that --

18 THE COURT: Okay. What was the response?

19 MR. SULLIVAN: From what I understand it is still --
20 that is still ongoing.

21 THE COURT: How is it ongoing and you guys knew you
22 had a hearing in front of me today? Have you responded to the
23 thing that they gave you a week ago?

24 MR. SULLIVAN: Your Honor, I have not had
25 personally -- not personally worked on that response

1 specifically, Your Honor. And I am --

2 THE COURT: Okay. What were the narrowed topics
3 that you gave?

4 MS. GOLDENBERG: In short, Your Honor, what we're
5 asking for are documents related to two things; one the Safety
6 Advisory Committee and two --

7 THE COURT: Safety Advisory Committee at Uber?

8 MS. GOLDENBERG: At Uber that RAINN played a role
9 on. And the second thing are documents related to the
10 development of Uber's taxonomy, which is how they describe
11 different types of sexual abuse. And Uber's publicly
12 available U.S. safety reports, which are also part of our
13 subpoena, detail that RAINN was part of the process of
14 developing both the taxonomy as well as putting together the
15 safety report. And that's --

16 THE COURT: That's from the Safety Advisory
17 Committee?

18 MS. GOLDENBERG: I'm sorry.

19 THE COURT: From the Safety Advisory Committee?

20 MS. GOLDENBERG: Those played a role in the final
21 product of the U.S. safety report. And we don't know exactly
22 how it worked, because we don't have their documents. But
23 what we are aware of is that they were involved in the Safety
24 Advisory Committee and the final safety report and the
25 development of the taxonomy.

1 THE COURT: Okay. When I start at 2:00, I start at
2 2:00, I don't start at 2:03, I don't start at 2:05, I don't
3 start at 2:10. If you're ten minutes early, you're 15 minutes
4 late. And right now you're actually late.

5 MR. ADELMANN: I apologize, Your Honor. Sincere
6 apologies.

7 THE COURT: What caused you to be late?

8 MR. ADELMANN: Your Honor, my office is in Virginia.
9 I was over here at 1:30 and I was looking for parking. I
10 turned around on the D Street underpass and accidentally went
11 down 395 --

12 THE COURT: All right. All right. She says that
13 she sent you all narrowed requests last week and she hasn't
14 heard back from you all.

15 MR. ADELMANN: That is correct, Your Honor.

16 THE COURT: Come on up. Make an appearance and come
17 on up.

18 MR. ADELMANN: Good morning, Your Honor, Sam -- good
19 afternoon, excuse me, Sam Adelmann from Maguire Woods on
20 behalf of the nonparty RAINN. Your Honor, I did receive
21 Ms. Hoefs' email, I -- it took a while to get a hold of my
22 client. I discussed it with my client just yesterday and was
23 prepared to respond today.

24 THE COURT: Did you think maybe it would be good to
25 respond to her before I had to call this status conference and

1 prepare for it.

2 MR. ADELMANN: Your Honor, I did my level best to
3 get a hold of my client and discuss the limited terms --

4 THE COURT: What is the response? Are you going to
5 give her the narrowed subpoena documents?

6 MR. ADELMANN: Well, I think, Your Honor -- I mean,
7 we did want to be heard on the opposition of the motion to
8 transfer.

9 THE COURT: Well, you're late and I already denied
10 it.

11 MR. ADELMANN: Understood, Your Honor. I'm happy to
12 speak with Ms. Hoefs in the hallway --

13 THE COURT: We're going to get this squared away
14 right now. What is your response on her narrowed request?

15 MR. ADELMANN: Your Honor, we still believe that
16 it's overly broad and unduly burdensome.

17 THE COURT: What's overly broad? Let's take them
18 one at a time. The Safety Committee documents, and what
19 documents exactly do you want?

20 MS. GOLDENBERG: What we'd like are the documents
21 that show the role that RAINN played on Uber's Safety Advisory
22 Committee.

23 THE COURT: Okay. And I'm sure you're happy for
24 documents sufficient to show; right?

25 MS. GOLDENBERG: Yes.

1 THE COURT: All right. That's not overly broad.
2 You're producing that. Second?

3 MS. GOLDENBERG: Second, we'd like the documents
4 relating to the development of Uber's taxonomy.

5 THE COURT: Okay. All documents or documents
6 sufficient to show?

7 MS. GOLDENBERG: I mean, I think this is an all
8 documents request, because documents sufficient to show would
9 really just give us definitions for what the taxonomy is,
10 that's available already. What we need to know is
11 specifically how they decided what was going to count and what
12 wasn't.

13 THE COURT: Okay. What's the response on that?

14 MR. ADELMANN: Your Honor, I think that the response
15 sort of globally here is the burden it would be on my client
16 to --

17 THE COURT: You're a third party, this is not --
18 we're not playing the burden game. Okay. I litigated for 22
19 years, this is not burdensome. And frankly, you missed the
20 lecture, I gave her a lecture, your lecture was saying no
21 documents whatsoever was totally inappropriate to this
22 subpoena. Which is why I'm super annoyed at both of you for
23 not having met and conferred much earlier on the actual
24 substance, even if you were going to disagree on the transfer
25 or the whatever.

1 But specific to the request that she just gave, what
2 is the overbroad objection there, because she's narrowed a
3 subpoena that was way overbroad, 11, 12 or 13 areas to just
4 two. The first is not broad at all. The second maybe, but
5 tell me why that's particularly burdensome.

6 MR. ADELMANN: Well, Your Honor, I still see that
7 there's 12 requests even in the narrowed subpoena, but as
8 to --

9 THE COURT: I thought you just told me there were
10 only two requests?

11 MS. GOLDENBERG: I apologize, I was paraphrasing.
12 But basically what it boils down to is that. And we're happy
13 to go with what I put on the record.

14 THE COURT: Okay. Good. You've got it narrowed to
15 two.

16 MR. ADELMANN: Well, if it's narrowed to two then --

17 THE COURT: We have documents sufficient to show the
18 role that you all played on the Safety Advisory Committee. I
19 am confident that that's very easy for you to get to them;
20 right?

21 MR. ADELMANN: Yes, Your Honor.

22 THE COURT: Okay. And No. 2 is, you want to say
23 that again for the record?

24 MS. GOLDENBERG: And I want to clarify that, I guess
25 there's 2A and B, because we didn't talk about the safety

1 report. But the two that we just talked about is the
2 development of Uber's taxonomy, which goes into the safety
3 report. So we can call it 2, I guess.

4 THE COURT: Okay. I just want to be absolutely
5 clear what we're dealing with. No. 1 is documents sufficient
6 to show RAINN's involvement on the Safety -- on the Uber
7 Safety Advisory Committee.

8 MS. GOLDENBERG: Correct, Your Honor.

9 THE COURT: All right. And I assume if there's no
10 clean document you're happy to get a letter from them or
11 something from them telling them what it is; right?

12 MS. GOLDENBERG: My understanding is that there are
13 going to be meeting minutes that show us precisely what that
14 role was. And that's the type of document we envisioned
15 getting. Again, I don't know what they have, but that's my
16 guess.

17 THE COURT: Okay. Well, he's going to give you a
18 document sufficient to show what the role was. It's not going
19 to be expansive. And if he represents to you that he doesn't
20 have that kind of document, then he's going to -- you guys are
21 going to figure out some way that he's going to tell you what
22 it is in writing. And then you can have it like an
23 interrogatory even though he's a third party, okay?

24 MS. GOLDENBERG: Understood.

25 THE COURT: All right. Your second request is

1 documents regarding how the taxonomy report -- how the
2 taxonomy was created for the safety report.

3 MS. GOLDENBERG: Correct. And then the role that
4 RAINN played with the safety report as well.

5 THE COURT: Okay. Well, I just want to take them
6 each separately. So let's start with the second one. All
7 right. Documents relating to how the taxonomy categories were
8 put together. What is that yay, nay, what do we have?

9 MR. ADELMANN: Your Honor, I guess my objection --
10 my only objection to that would be -- and perhaps this could
11 be dealt with with a protective order that may already be in
12 place in the MDL, but I don't know to what extent the taxonomy
13 was specific to Uber or was something proprietary that RAINN
14 has developed and used with other clients, in which case I
15 would claim that there's some proprietary, confidential
16 interest there.

17 MS. GOLDENBERG: We have a protective order in the
18 MDL. Happy to have it apply to these documents as well. And
19 Uber's U.S. safety report says that it is publicly available
20 that RAINN was involved in developing the taxonomy, at least
21 as it relates to Uber. We don't need documents relating to
22 other people.

23 THE COURT: All right. So good?

24 MR. ADELMANN: Yes, Your Honor.

25 THE COURT: All right. When you say all documents,

1 he doesn't have to search every nook and cranny --

2 MS. GOLDENBERG: No.

3 THE COURT: Okay? He's going to take one or two
4 relevant individuals, look at their emails, and go to whatever
5 shared drive there is; right?

6 MS. GOLDENBERG: I've just finished two days of
7 search term and custodian negotiations. I'm certainly happy
8 to meet and confer separately with him and make sure that
9 happens.

10 THE COURT: Okay. All right. And then the third --
11 go ahead.

12 MR. ADELMANN: I'm happy to meet and confer. I
13 would just like, if appropriate from the Court, you know, some
14 limitation around that, whatever the Court deems appropriate.
15 I mean, part of our position today was that -- and if I may,
16 you know, my client's received two other subpoenas from state
17 court JCCP, another coordinated action identical to these
18 requests. And in meeting conferring on that my client has
19 discovered there's about 40 custodians that may be responsible
20 for communications with Uber. And that would be overly
21 burdensome. So I do --

22 THE COURT: Okay. You get five. You get five
23 custodians.

24 MS. GOLDENBERG: Sure.

25 MR. ADELMANN: Thank you, Your Honor.

1 THE COURT: They get five.

2 MR. ADELMANN: Thank you.

3 THE COURT: They don't get anymore than five. You
4 get to choose the five. They better be the actual core five.
5 Because if she comes back and tells me that you guys played
6 games, then she's going to get 40.

7 MR. ADELMANN: Understood.

8 THE COURT: Okay. All right. And then what's the
9 third -- and that's for all of these. What's the third issue?

10 MS. GOLDENBERG: The third is RAINN's role in the --

11 THE COURT: Oh, and I'm sorry, yes, you can -- sign
12 the protective order, file it in this court, because I'll have
13 jurisdiction over things. But just use the whatever
14 protective order they used in the MDL. I'm sure that will be
15 fine for you. If not, let me know.

16 MR. ADELMANN: Yes.

17 MS. GOLDENBERG: Understood.

18 THE COURT: What's the third thing?

19 MS. GOLDENBERG: The last thing is RAINN's role with
20 the Uber U.S. safety report.

21 THE COURT: Is that different than the Safety
22 Advisory Committee?

23 MS. GOLDENBERG: It is. The safety report is a
24 document that was publicly made available by Uber. They've
25 had two of them that have covered the number and nature of

1 sexual assaults that took place in Ubers. And, obviously,
2 there was a lot that went into creating that document. RAINN
3 was one of the outside organizations that helped Uber consult
4 on putting that together.

5 THE COURT: Okay. That's another document
6 sufficient to show; right?

7 MS. GOLDENBERG: No, that's an all documents
8 request, but we understand the confines you just gave us with
9 custodians --

10 THE COURT: Well, no, hold on. Hold on. You just
11 told me documents -- you need to know what the role was, why
12 is that not just a document sufficient to show.

13 MS. GOLDENBERG: Not just their role, but the
14 selections that were made with RAINN's assistance.

15 THE COURT: Okay. Well, that's not what you just
16 said. I'm trying to be really specific here so that we're not
17 coming back and doing this again.

18 MS. GOLDENBERG: No, I appreciate that.

19 THE COURT: Because that guy is freaked out over
20 there and he doesn't want to have to be in front of me
21 again.

22 MS. GOLDENBERG: I apologize if I was inarticulate
23 and thanks for clarifying.

24 THE COURT: Okay. So with respect to what their
25 role was, let's just take that, that's just a document

1 sufficient to show; right? Just put aside the other stuff
2 that you want.

3 MS. GOLDENBERG: Yes.

4 THE COURT: All right. So a document sufficient to
5 show what RAINN's role was in the Safety Advisory Report.
6 Same issue if there's not a document on it, you guys figure
7 out some way to get that information to them in a way that
8 they can use, okay?

9 MR. ADELMANN: Understood, Your Honor.

10 THE COURT: All right. Now what's the fourth thing
11 you want?

12 MS. GOLDENBERG: It's really tied to that. So the
13 decisions that RAINN helped Uber make for the U.S. safety
14 report; what went in, how was it classified, really just those
15 two things. And that's more of an all documents request,
16 because we don't know exactly what decisions were made or how
17 they were formed.

18 THE COURT: All right. Do you know from based on
19 your are JCCP meet and confers how wide that area is?

20 MR. ADELMANN: I don't know that that's going to be
21 contain -- I mean, the role, the advice that they gave as to
22 safety reports I don't think is going to be contained in a
23 finite number of documents. If they want the safety reports,
24 we can produce those.

25 THE COURT: No, no, they want to know how you went

1 into deciding what the categories were going to be.

2 MR. ADELMANN: So I think if the Court would make it
3 documents sufficient to show, then we can determine if
4 there's, you know, a limited number of documents --

5 THE COURT: Actually, one second. How is what they
6 did in the safety report different from how they decided what
7 the taxonomy -- wasn't the taxonomy what the safety report
8 used to get their numbers? I know all this because I
9 represented Lyft forever on these issues.

10 MS. GOLDENBERG: Yeah, so they're closely tied, but
11 they're not exactly the same. So the taxonomy, as you
12 correctly stated, is basically how they classified sexual
13 assaults, right. But then the safety report took it one step
14 further. There were decisions made about what type of sexual
15 assault was counted. And there was work done on the back end
16 to decide, okay, we're looking at this report, this one
17 counts, this one doesn't. So there's a decision-making
18 process behind the scenes that isn't available to us from
19 reading the public --

20 THE COURT: I'm sorry, this one does or doesn't
21 count, that goes into how the taxonomy report was created.

22 MS. GOLDENBERG: The -- I think we're just --
23 there's a semantics issue. So the publicly available document
24 is called the U.S. safety report.

25 THE COURT: Right.

1 MS. GOLDENBERG: The taxonomy is the classification
2 criteria for the sexual assault.

3 THE COURT: Right.

4 MS. GOLDENBERG: So the U.S. safety report describes
5 the taxonomy. And I think what we really want for the
6 document portion of our request, just to get this down to
7 brass tax, is we want to know how the safety report was
8 created. How did they decide what the taxonomy criteria were.
9 How did they decide what was going to be included and excluded
10 from the U.S. safety report. That's what it boils down to.

11 THE COURT: Okay. Why isn't that all -- why can't
12 you get that part from Uber?

13 MS. GOLDENBERG: We can get some of it from Uber,
14 but because RAINN was hired on as an outside consultant
15 they're going to have internal documents that never went to
16 Uber.

17 THE COURT: Well, why are those relevant?

18 MS. GOLDENBERG: I'm sorry?

19 THE COURT: Why are those relevant? I mean, at the
20 end of the day the only thing that's going to be relevant to
21 you is the decisions that Uber made.

22 MS. GOLDENBERG: Well, not necessarily, because if
23 RAINN was to make a recommendation that Uber chose not to
24 accept, that's going to be relevant to our case. RAINN was
25 brought on --

1 THE COURT: Well, if there's -- if you find a
2 recommendation that RAINN made that Uber didn't follow, then
3 you can come back to me. But I'm not going to have them go on
4 a wild goose chase about this particular -- the taxonomy
5 report I understand, that is key to you all trying to attack
6 the report. I'm on board. You're going to get five
7 custodians on that. I'm not going to send them on a wild
8 goose chase on if they made a recommendation and Uber didn't
9 follow it. If that ends up being the case, come back to me
10 and I'll think about it again. But at the end of the day, if
11 they made a recommendation and Uber didn't follow it, you
12 really don't need much more than that. I mean, that is *prima
facie*, you would argue, bad. And if they really, really meant
13 it, that's not going to be any worse for you than if they kind
14 of meant it. They made the recommendation.

16 MS. GOLDENBERG: Certainly, and that's just what
17 we'd like to know is if the recommendation was made,
18 presumably that's a document that RAINN has that --

22 MS. GOLDENBERG: Hopefully. We're not sure. But
23 understood.

1 MS. GOLDENBERG: We're certainly going to have Uber
2 depositions. We have separate issues with Uber where they
3 have refused to produce custodians on certain issues. And
4 because of that had a hearing in the MDL where the judge ruled
5 we don't have to get everything from Uber or wait to see if we
6 get it from Uber before we go elsewhere, which is why we're
7 here. But I understand and respect your ruling. We'll take
8 it and we'll come back if we need to.

9 THE COURT: All right. Does that solve all your
10 issues?

11 MR. ADELMANN: Understood, Your Honor. Yes.

12 THE COURT: All right. Anything else?

13 MS. GOLDENBERG: No. Thanks for your time, Your
14 Honor.

15 THE COURT: Okay. I despise discovery disputes. I
16 think most of them, if not all of them, should be figured out
17 amongst the parties. I realize it's a somewhat odd posture,
18 which is why I had the hearing as opposed to just telling you
19 all to meet and confer again, which I maybe should have done.

20 But going forward, you guys figure this stuff out.
21 Because the next time you guys are in front of me, whoever
22 loses is going to lose big. So in other words, if you want
23 all documents and he loses, you're going to get all documents.
24 If you want all documents and he wins, you're going to get
25 zero documents going forward. Okay?

1 MS. GOLDENBERG: Understood.

2 THE COURT: All right. Thank you, everyone.

3 (The proceedings were concluded 2:18 p.m.)

4 I, Christine Asif, RPR, FCRR, do hereby certify that
5 the foregoing is a correct transcript from the stenographic
6 record of proceedings in the above-entitled matter.

7 _____/s/_____
8 Christine T. Asif
9 Official Court Reporter

| | | | |
|---------------|-----------------|-----------------|---------------|
| < 0 >. | | /s/ | |
| 00 3:6, 4:15, | | | 4:19. |
| 7:1, 7:2. | 21:9. | | 14:24, 17:18, |
| 03 7:2. | . | apologies | 17:23. |
| 05 7:2. | . | 7:6. | Avenue 1:43. |
| . | < A >. | apologize 7:5, | aware 6:23. |
| . | able 19:20. | 10:11, | away 4:13, |
| < 1 >. | above-entitled | 15:22. | 4:14, 8:13. |
| 1 7:9, 11:5. | 21:7. | appearance | . |
| 10 7:3. | absolutely | 2:12, 2:17, | . |
| 11 10:3. | 11:4. | 7:16. | < B >. |
| 12 10:3, | Abuse 1:4, 2:3, | APPEARANCES | back 4:24, |
| 10:7. | 6:11. | 1:23. | 4:25, 5:1, |
| 13 10:3. | accept 18:24. | applications | 5:12, 7:14, |
| 14 1:27. | accidentally | 3:13. | 14:5, 15:17, |
| 15 7:3. | 7:10. | apply 12:18. | 17:15, 19:3, |
| 1750 1:33. | action 13:17. | appreciate | 19:9, 20:8. |
| 18 21:3. | actual 4:9, | 15:18. | bad 19:13. |
| 1800 1:34. | 4:10, 9:23, | approach 2:4. | based 4:22, |
| . | 14:4. | appropriate | 16:18. |
| . | Actually 7:4, | 13:13, | basically |
| < 2 >. | 17:5. | 13:14. | 10:12, |
| 2 3:6, 4:15, | Adelmann 1:31, | area 16:19. | 17:12. |
| 7:1, 7:2, | 2:13, 2:24, | areas 10:3. | behalf 2:7, |
| 7:3, 10:22, | 4:12, 7:5, | argue 4:1, | 7:20. |
| 11:3, 21:3. | 7:19. | 4:21, | behind 17:18. |
| 20001 1:44. | admitted 5:9. | 19:13. | believe 8:15. |
| 20016 1:29. | advice 16:21. | around 7:10, | best 8:2. |
| 202 1:45. | Advisory 6:6, | 13:14. | better 14:4. |
| 2024 1:13. | 6:7, 6:16, | aside 16:1. | big 20:22. |
| 22 9:18. | 6:19, 6:24, | Asif 1:41, | blocks 2:13, |
| 22102 1:35. | 8:21, 10:18, | 21:5, | 4:13, 4:14. |
| 24-0073-ACR | 11:7, 14:22, | 21:10. | board 19:6. |
| 1:5. | 16:5. | assault 17:15, | boils 10:12, |
| 24-73 2:2. | afternoon 2:6, | 18:2. | 18:10. |
| 2:00 1:15. | 2:9, 2:11, | assaults 15:1, | Boulevard |
| 2A 10:25. | 7:19. | 17:13. | 1:33. |
| . | ago 5:23. | assistance | brass 18:7. |
| . | agree 4:6, | 15:14. | broad 8:16, |
| < 3 >. | 4:8. | assisting | 8:17, 9:1, |
| 30 7:9. | ahead 13:11. | 2:24. | 10:4. |
| 333 1:43. | already 8:9, | assume 3:18, | brought |
| 354-3247 | 9:10, | 11:9. | 18:25. |
| 1:45. | 12:11. | attack 19:5. | bunch 3:14. |
| 395 7:11. | amongst | attorney 2:14, | burden 9:15, |
| . | 20:17. | 2:16, 2:19, | 9:18. |
| . | Ana C. Reyes | 2:21, 3:1, | burdensome |
| < 4 >. | 1:19. | 5:8. | 8:16, 9:19, |
| 40 13:19, | annoyed 9:22. | August 6 | 10:5, |
| 14:6. | answer 3:16, | 1:13. | 13:21. |
| | | available 6:12, | . |
| | | 9:10, 12:19, | . |

| | | | |
|---|--|---|--|
| < C >. | 17:10. | 11:8, 12:3, 21:6. | deems 13:14. |
| C. 1:14, 1:44. | Columbia 1:2, 5:9. | correctly 17:12. | Defendant 1:31. |
| call 7:25, 11:3. | comes 14:5. | Counsel 2:4, 2:5. | definitely 19:24. |
| called 3:15, 17:24. | coming 15:17. | count 9:11, 17:21. | definitions 9:9. |
| care 4:14, 5:10. | Committee 2:3, 2:8, 6:6, 6:7, 6:17, 6:19, 6:24, | counted 17:15. | denied 8:9. |
| Case 2:2, 3:24, 12:14, 18:24, 19:9. | 8:18, 8:22, 10:18, 11:7, 14:22. | counts 17:17. | depose 19:20. |
| categories 12:7, 17:1. | communications 13:20. | courtroom 5:11. | depositions 19:25, 20:2. |
| caused 7:7. | computer-aided 1:49. | covered 14:25. | describe 6:10. |
| certain 20:3. | concluded 21:3. | cranny 13:1. | describes 18:4. |
| Certainly 13:7, 19:16, 20:1. | confer 13:8, 13:12, 20:19. | created 12:2, 17:21, 18:8. | despise 20:15. |
| certify 21:5. | conference 5:2, 7:25. | creating 15:2. | detail 6:13. |
| changes 5:17. | conferred 9:23. | criteria 18:2, 18:8. | determine 17:3. |
| chase 19:4, 19:8. | conferring 13:18. | custodian 13:7. | developed 12:14. |
| choose 14:4. | confers 4:10, 4:16, 4:20, | custodians 13:19, 13:23, 15:9, 19:7, 20:3. | developing 6:14, 12:20. |
| chose 18:23. | 16:19. | . | development 6:10, 6:25, 9:4, 11:2. |
| Christine 1:41, 21:5, 21:10. | confident 10:19. | . | different 6:11, 14:21, 17:6. |
| CIVIL 1:4. | confidential 12:15. | < D >. | disagree 9:24. |
| claim 12:15. | confines 15:8. | day 18:20, 19:10. | discovered 13:19. |
| clarify 10:24. | Constitution 1:43. | days 13:6. | discovery 20:15. |
| clarifying 15:23. | consult 15:3. | DC 1:29. | discuss 8:3. |
| classification 18:1. | consultant 18:14. | dealing 11:5. | discussed 7:22. |
| classified 16:14, 17:12. | contain 16:21. | dealt 12:11. | disputes 20:15. |
| clean 11:10. | contained 16:22. | decide 17:16, 18:8, 18:9. | District 1:1, 1:2, 1:20, 5:9. |
| clear 11:5. | coordinated 13:17. | decided 9:11, 17:6. | document 11:10, 11:14, 11:18, 11:20, 14:24, 15:2, 15:5, |
| CLERK 2:2, 3:15. | core 14:4. | deciding 17:1. | |
| client 3:3, 7:22, 8:3, 9:15, 13:16, 13:18. | Corner 1:35. | decision-making 17:17. | |
| clients 12:14. | Correct 7:15, | decisions 16:13, 16:16, 17:14, | |
| closely | | 18:21. | |

| | | | |
|---|---|---|--|
| 15:12, 15:25, 16:4, 16:6, 17:23, 18:6, 19:18, 19:20. Documents 4:8, 4:10, 6:5, 6:9, 6:22, 8:5, 8:18, 8:19, 8:20, 8:24, 9:3, 9:5, 9:8, 9:21, 10:17, 11:5, 12:1, 12:7, 12:18, 12:21, 12:25, 15:7, 15:11, 16:15, 16:23, 17:3, 17:4, 18:15, 20:23, 20:24, 20:25. doing 5:2, 15:17. done 17:15, 20:19. down 3:9, 3:11, 7:11, 10:12, 18:6, 18:10. drive 13:5. . . < E >. earlier 9:23. early 7:3. easy 10:19. elsewhere 20:6. email 7:21. emails 13:4. end 17:15, 18:20, 19:10. ends 19:9. enough 3:18. envisioned 11:14. Especially 5:2. | Esquire 1:25, 1:31. everyone 21:2. everything 20:5. exactly 6:21, 8:19, 16:16, 17:11. excluded 18:9. excuse 7:19. expansive 11:19. extent 12:12. . . < F >. facie 19:13. FCRR 1:41, 21:5. Federal 1:42. few 2:13, 4:13. figure 4:5, 11:21, 16:6, 20:20. figured 20:16. file 14:12. filing 3:14, 3:20. final 6:20, 6:24. find 3:15, 19:1. fine 14:15. finished 13:6. finite 16:23. First 3:12, 3:14, 10:4. five 13:22, 14:1, 14:3, 14:4, 19:6. Floor 1:28. follow 3:21, 19:2, 19:9, 19:11. foregoing | 21:6. forever 17:9. formed 16:17. forth 5:13. forward 20:20, 20:25. fourth 16:10. frankly 9:19. freaked 15:19. front 5:22, 15:20, 20:21. future 3:12, 3:18. . . < G >. game 9:18. games 14:6. gave 5:23, 6:3, 9:20, 10:1, 15:8, 16:21. getting 11:15. give 8:5, 9:9, 11:17. globally 9:15. GOLDENBERG 1:25, 1:26, 2:7, 2:10, 15:18, 18:4. goose 19:4, 19:8. guess 10:24, 11:3, 11:16, 12:9. guy 15:19. guys 4:5, 4:7, 5:21, 11:20, 14:5, 16:6, 20:20, 20:21. . . < H >. . . hac 3:12, | 3:20. hacs 3:14, 3:18. hallway 8:12. happens 13:9. Happy 8:11, 8:23, 10:12, 11:10, 12:18, 13:7, 13:12. heard 4:24, 4:25, 5:1, 5:15, 7:14, 8:7. hearing 5:22, 20:4, 20:18. helped 15:3, 16:13. hereby 21:5. hired 18:14. Hoefs 7:21, 8:12. Hold 4:1, 4:3, 7:21, 8:3, 15:10. Honor 2:6, 2:11, 3:7, 3:10, 3:22, 4:17, 5:4, 5:24, 6:1, 6:4, 7:5, 7:8, 7:15, 7:18, 7:20, 8:2, 8:6, 8:11, 8:15, 9:14, 10:6, 10:21, 11:8, 12:9, 12:24, 13:25, 16:9, 20:11, 20:14. Honorable 1:19. Hopefully 19:22. . . < I >. identical |
|---|---|---|--|

| | | | |
|----------------|----------------|-----------------|-----------------|
| 13:17. | 7:13, | 16:19, | nay 12:8. |
| inappropriate | 14:19. | 20:19. | necessarily |
| 4:8, 9:21. | late 7:4, 7:7, | meeting 11:13, | 18:22. |
| inarticulate | 8:9. | 13:18. | need 3:21, |
| 15:22. | lawyer 3:8. | met 9:23. | 9:10, 12:21, |
| Incest 1:5, | least 12:20. | minute 3:20. | 15:11, 19:12, |
| 2:3. | leaving 4:6. | minutes 7:3, | 20:8. |
| included | lecture 9:20. | 11:13. | negotiations |
| 18:9. | letter 11:10. | missed 9:19. | 13:7. |
| individuals | letting 5:10, | morning 2:9, | Network 1:5, |
| 13:4. | 5:11. | 7:18. | 1:13, 2:3. |
| information | level 8:2. | motion 8:7. | new 3:18. |
| 16:7. | limitation | motions 4:22. | next 20:21. |
| interest | 13:14. | Motions Hearing | Nigh 1:26. |
| 12:16. | limited 8:3, | 1:18. | No. 1:4, 3:8, |
| internal | 17:4. | MR. ADELMANN | 10:22, 11:5, |
| 18:15. | litigated | 7:8, 7:15, | 20:13. |
| interrogatory | 9:18. | 7:18, 8:2, | nonparty |
| 11:23. | long 3:17. | 8:6, 8:11, | 7:20. |
| involved 6:23, | look 13:4. | 8:15, 9:14, | nook 13:1. |
| 12:20. | looking 7:9, | 10:6, 10:16, | notes 2:25. |
| involvement | 17:16. | 10:21, 12:9, | number 14:25, |
| 11:6. | lose 20:22. | 12:24, 13:12, | 16:23, |
| issue 14:9, | loses 20:22, | 13:25, 14:2, | 17:4. |
| 16:6, | 20:23. | 14:7, 14:16, | numbers 17:8. |
| 17:23. | lot 15:2. | 16:9, 16:20, | NW 1:27, |
| issues 17:9, | Lyft 17:9. | 17:2, | 1:43. |
| 20:2, 20:3, | . | 20:11. | . |
| 20:10. | . | MR. SULLIVAN | . |
| . | < M >. | 5:16, 5:19, | < O >. |
| . | M. 1:31. | 5:24. | objection 10:2, |
| < J >. | machine 1:48. | MS 2:10, 7:21, | 12:9, |
| Jaye 1:25. | Maguire 7:19. | 8:12, 15:18, | 12:10. |
| JCCP 13:17, | Marlene 1:25, | 18:4. | objections |
| 16:19. | 2:7. | . | 4:2. |
| John 2:12. | matter 21:7. | . | obviously |
| Judge 1:20, | Mcguire 1:32. | < N >. | 15:1. |
| 20:4. | MDL 4:22, | name 2:5, | odd 20:17. |
| jurisdiction | 12:12, 12:18, | 2:11. | office 7:8. |
| 14:13. | 14:14, | narrowed 4:23, | Official 1:42, |
| . | 20:4. | 6:2, 7:13, | 21:11. |
| . | mean 8:6, 9:7, | 8:5, 8:14, | Okay 3:5, 3:21, |
| < K >. | 13:15, 16:21, | 10:2, 10:7, | 3:25, 4:25, |
| key 19:5. | 18:19, | 10:14, | 5:18, 6:2, |
| kind 11:20, | 19:12. | 10:16. | 7:1, 8:23, |
| 19:14. | meant 19:13, | narrower | 9:5, 9:13, |
| . | 19:15. | 4:23. | 9:18, 10:14, |
| . | meet 4:10, | National 1:5, | 10:22, 11:4, |
| < L >. | 4:15, 4:20, | 2:3. | 11:17, 11:23, |
| last 4:23, | 13:8, 13:12, | nature 14:25. | 12:5, 13:3, |

| | | | |
|---|---|--|--|
| 13:10, 13:22, 14:8, 15:5, 15:15, 15:24, 16:8, 17:16, 18:11, 20:15, 20:25. one 6:5, 8:18, 12:6, 13:3, 15:3, 17:5, 17:13, 17:16, 17:17, 17:20. ongoing 5:20, 5:21. opposed 20:18. opposition 8:7. order 12:11, 12:17, 14:12, 14:14. organizations 15:3. outside 15:3, 18:14. overbroad 10:2, 10:3. overly 8:16, 8:17, 9:1, 13:20. . . < P >. p.m. 1:15, 21:3. paraphrasing 10:11. parking 7:9. part 6:12, 6:13, 13:15, 18:12. particular 19:4. particularly 10:5. parties 20:17. party 4:21, 9:17, 11:23. | people 12:22, 19:21. perhaps 12:10. personally 4:12, 5:25. Petitioner 1:9. place 12:12, 15:1. Plaintiff 1:25, 2:2, 2:5, 2:7. PLAINTIFF'S STEERING COMMITTEE 1:7. played 6:8, 6:20, 8:21, 10:18, 12:4, 14:5. playing 9:18. please 2:4. PLLC 1:26. podium 2:4. portion 18:6. position 13:15. posture 20:17. precisely 11:13. prepare 8:1. prepared 7:23. presumably 19:18. prima 19:12. pro 3:12, 3:14, 3:18, 3:20. Proceedings 1:48, 21:3, 21:7. process 3:21, 6:13, 17:18. produce 4:7, 4:8, 16:24, 20:3. produced | 1:48. producing 9:2. product 6:21. proposed 5:17. proprietary 12:13, 12:15. protective 12:11, 12:17, 14:12, 14:14. public 17:19. publicly 6:11, 12:19, 14:24, 17:23. put 4:10, 10:13, 12:8, 16:1. putting 6:14, 15:4. . . < Q >. quash 4:4. question 4:19. . . < R >. RAINN 2:16, 2:20, 2:21, 3:4, 4:20, 4:23, 6:8, 6:13, 7:20, 8:21, 11:6, 12:4, 12:13, 12:20, 14:10, 14:19, 15:2, 15:14, 16:5, 16:13, 18:14, 18:23, 18:24, 19:2, 19:18. Rape 1:4, 2:3. RAPE ABUSE AND INCEST NATIONAL | 1:12. Raso 1:26. re 1:4. reading 17:19. ready 5:3. realize 20:17. really 9:9, 15:16, 16:12, 16:14, 18:5, 19:12, 19:13. receive 5:16, 7:20. received 13:16. recommendation 18:23, 19:2, 19:8, 19:11, 19:15, 19:17, 19:19. record 2:5, 10:13, 10:23, 21:7. recorded 1:48. refused 20:3. regarding 12:1. related 6:5, 6:9. relates 12:21. relating 9:4, 12:7, 12:21. relevant 13:4, 18:17, 18:19, 18:20, 18:24. Report 6:15, 6:21, 6:24, 11:1, 11:3, 12:1, 12:2, 12:4, 12:19, 14:20, 14:23, 16:5, 16:14, 17:6, 17:7, 17:13, 17:16, |
|---|---|--|--|

| | | | |
|--|---|--|---|
| 17:21, 17:24, 18:4, 18:7, 18:10, 19:5, 19:6. Reported 1:41. Reporter 1:42, 21:11. reports 6:12, 16:22, 16:23. represented 17:9. represents 11:19. request 8:14, 9:8, 10:1, 11:25, 15:8, 16:15, 18:6. requests 4:23, 7:13, 10:7, 10:10, 13:18. respect 15:24, 20:7. respond 7:23, 7:25. responded 4:21, 5:22. Respondent 1:14. response 5:18, 5:25, 8:4, 8:14, 9:13, 9:14. responsible 13:19. Ridge 1:27. role 6:8, 6:20, 8:21, 10:18, 11:14, 11:18, 12:3, 14:10, 14:19, 15:11, 15:13, 15:25, 16:5, 16:21. RPR 1:41, 21:5. ruled 20:4. | ruling 20:7. rulings 4:22. . . < S >. S. 6:12, 6:21, 12:19, 14:20, 16:13, 17:24, 18:4, 18:10. Sam 7:18, 7:19. Samuel 1:31. saying 9:20. says 7:12, 12:19. scenes 17:18. search 13:1, 13:7. seated 4:3. Second 6:9, 9:2, 9:3, 10:4, 11:25, 12:6, 17:5. Secondly 3:23. selections 15:14. semantics 17:23. send 19:7. sent 4:23, 7:13. separate 20:2. separately 12:6, 13:8. settled 3:24. sexual 6:11, 15:1, 17:12, 17:14, 18:2. shared 13:5. short 4:19, 6:4. shorthand 1:48. show 8:21, 8:24, 9:6, 9:8, 10:17, | 11:6, 11:13, 11:18, 15:6, 15:12, 16:1, 16:5, 17:3. sign 14:11. Sincere 7:5. Sit 3:9, 3:11. solve 20:9. somewhat 20:17. sorry 6:18, 14:11, 17:20, 18:18. sort 3:13, 9:15. speaking 5:4. specific 10:1, 12:13, 15:16. specifically 6:1, 9:11. Square 1:27. squared 8:13. start 3:5, 7:1, 7:2, 7:3, 12:6. starting 2:5, 3:8. state 2:4, 13:16. stated 17:12. States 1:1, 1:20. status 7:25. Steering 2:2, 2:7. stenographic 21:6. step 17:13. Street 7:10. stuff 16:1, 20:20. SUBPOENA 1:4, 4:5, 4:21, 4:23, 6:13, 8:5, 9:22, 10:3, 10:7. subpoenas 13:16. | substance 9:24. substantive 4:20. sufficient 8:24, 9:6, 9:8, 10:17, 11:5, 11:18, 15:6, 15:12, 16:1, 16:4, 17:3. Suite 1:34. SULLIVAN 2:11, 2:12, 2:15, 2:17, 2:21, 2:24, 3:2, 3:4, 3:7, 3:10, 4:12, 5:4, 5:8, 5:12. super 9:22. . . < T >. T. 1:41, 21:10. talked 11:1. tax 18:7. taxonomy 6:10, 6:14, 6:25, 9:4, 9:9, 11:2, 12:1, 12:2, 12:7, 12:12, 12:20, 17:7, 17:11, 17:21, 18:1, 18:5, 18:8, 19:4. tells 14:5. ten 7:3. term 13:7. terms 8:3. Thanks 15:23, 20:13. They've 14:24. Third 1:28, 4:1, 4:21, 9:17, 11:23, 13:10, 14:9, |
|--|---|--|---|

| | | |
|---|--|---|
| 14:10, 14:18. though 11:23. tied 16:12, 17:10. today 2:12, 3:24, 4:6, 5:22, 7:23, 13:15. together 6:14, 12:8, 15:4. took 7:21, 15:1, 17:13. topics 6:2. totally 4:7, 9:21. Transcript 1:18, 1:48, 21:6. transcription 1:49. transfer 3:17, 8:8, 9:24. transferring 3:24. trying 15:16, 19:5. turned 7:10. two 4:9, 6:5, 6:6, 10:4, 10:10, 10:15, 10:16, 11:1, 13:3, 13:6, 13:16, 14:25, 16:15. type 11:14, 17:14. types 6:11. Tysons 1:33, 1:35. . . < U >. Uber 6:7, 6:8, 6:10, 6:11, 8:21, 9:4, 11:2, 11:6, 12:13, 12:19, 12:21, 13:20, | 14:20, 14:24, 15:3, 16:13, 18:12, 18:13, 18:16, 18:21, 18:23, 19:2, 19:8, 19:11, 19:20, 19:24, 20:1, 20:2, 20:5, 20:6. Ubers 15:1. underpass 7:10. understand 5:13, 5:19, 15:8, 19:5, 20:7. understanding 11:12. Understood 3:22, 5:12, 8:11, 11:24, 14:7, 14:17, 16:9, 19:23, 20:11, 21:1. unduly 8:16. United 1:1, 1:20. until 4:7. . . < v >. VA 1:35. Vaughn 1:26. versus 2:3. vice 3:12, 3:20. Virginia 7:8. vs 1:10. . . < W >. wait 20:5. waived 4:2. want. 3:13. Washington 1:14, 1:29, 1:44. week 4:24, 5:1, 5:15, 5:23, | 7:13. Whatever 2:10, 4:2, 9:25, 13:4, 13:14, 14:13. whatsoever 9:21. whoever 20:21. wide 16:19. wild 19:4, 19:7. will 14:14, 19:20. wins 20:24. Woods 1:32, 7:19. words 20:22. work 17:15. worked 5:25, 6:22. worse 19:14. writing 11:22. . . < Y >. yay 12:8. years 9:19. yesterday 7:22. . . < Z >. zero 20:25. |
|---|--|---|